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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**NANCY HALL, individually and as the
Representative and Administratrix of
the Estate of TOMMY HALL, deceased,
her husband,**

Plaintiff,

vs.

**CUNA MUTUAL GROUP; CUNA
MUTUAL INSURANCE SOCIETY,
Defendants.**

CIVIL ACTION - LAW

1:01-CV-1265

JUDGE CHRISTOPHER CONNER


**FILED
HARRISBURG, PA**

NOV 04 2002
MARY E. D'ANDREA, CLERK
Per PB
Deputy Clerk

PLAINTIFF'S MOTION IN LIMINE

Plaintiff, by and through undersigned counsel, hereby brings a Motion in Limine with respect to the above-captioned matter. The motion asks the Court to prohibit the introduction of evidence concerning an entry in the medical records dated April 30, 1998 for which there is no evidencary foundation and which is erroneous. The motion asks that the testimony of Defendants' Expert, Mr. Gencavage, be disallowed in that it is based, in its entirety, on the erroneous entry in the medical records concerning a 1996 mole removal, which never took place. Lastly, Plaintiff requests that the Court preclude CUNA from offering a defense in this case because of CUNA's refusal to respond to discovery requests despite a Court Order to do so.

Respectfully submitted,


Stephen R. Pedersen, Esq.

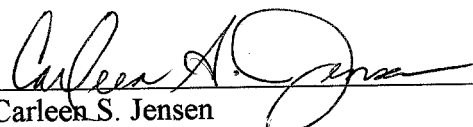
CERTIFICATE OF SERVICE

And now, this 4th day of Nov., 2002, I, Carleen S. Jensen, do hereby certify that I have, this date, served a true and correct copy of the within **PLAINTIFF'S MOTION IN LIMINE** upon each of the attorneys of record at the following address(es) by sending same in the United States mail:

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DATE: 11-4-02


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